REMARKS

INTRODUCTION

In accordance with the foregoing, claims 37-41 have been added. Claims 36-41 are pending and under consideration.

CLAIM REJECTIONS

Claims 14 and 16-35 were rejected under 35 USC 102(b) as being anticipated by Tsukamoto et al. (US 2002/0048033) (hereinafter "Tsukamoto").

Claims 14 and 16-35 were cancelled in the Amendment filed on June 12, 2009.

NEW CLAIMS

Claim 36 was added in the Amendment filed on June 12, 2009.

New claims 37-41 have been added to present alternate recitations and features of the present invention.

New claims 37 and 38 depend on claim 36 and are therefore believed to be allowable for at least the foregoing reason.

New claim 39 recites an image processing apparatus comprising a printing unit to execute printing functions; a processor to control printing functions executed by the printing unit, wherein the processor executes a plurality of programs in response to powering on of the image processing apparatus; a memory; an operation panel unit; and an interface to removably receive a portable storage unit, wherein if it is determined that a portable storage unit, connected to the interface, includes an execution file corresponding to one of the programs executed by the processor, the execution file stored in the portable storage unit is executed as a plug-in program of the corresponding one of the executed programs, wherein the plug-in program does not have an independent interface and can only be used by being connected with the corresponding one of the executed programs and provides additional function to the one of the executed programs that was not previously supported by the one of the executed programs.

It is respectfully submitted that new claim 39 patentably distinguishes over the relied upon prior art. In particular, new claim 39 clarifies that the plug in program adds additional functions that are not supported by the main program. Specifically, the plug in program of claim 39 does not change an old feature to a new feature, which the Examiner noted was anticipated by Tsukamoto in the rejection of claim 24, which has been cancelled.

Further, in the Office Action on page 7 dealing with the rejection of claim 17, the Examiner notes that in Tsukamoto, since the program in the ROM instructs the CPU to utilize a program in the interface cards to perform a feature on the apparatus, the implementation of the program by the CPU is considered analogous to the connection between a main program and a file for executing a function. In addition, paragraph [0117] of Tsukamoto discusses: "...if a storage enabled card, such as a memory card or a hard disk card, set in an empty card slot 122(or 121) stores a program for controlling the modem card with the NCU and data."

Accordingly, referring to the above description, Tsukamoto discloses that the program stored in the program IC card stores a program necessary for CPU to operate a new modem card, that is, an interface card. The interface card is a hardware apparatus which replaces a conventional modem 118. Therefore, the program of Tsukamoto is distinct from the plug in program of claim 39, which recites that the plug in program provides additional functions to the main program of an image forming apparatus, and is not a program for replacing a conventional function or operating certain hardware.

New claims 40 and 41 depend on claim 39 and are therefore believed to be allowable for at least the foregoing reason.

No new matter has been added, and entry and consideration are respectfully requested.

CONCLUSION

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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